

PASTOR, BEHLING & WHEELER, LLC 2201 Double Creek Drive, Suite 4004 Round Rock, TX 78664 Tel (512) 671-3434 Fax (512) 671-3446

> August 6, 2012 (PBW Project No. 1651)

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Mr. Chris Villarreal Remedial Project Manager, 6SF-RA U.S. Environmental Protection Agency Region 6 1445 Ross Avenue Dallas, Texas 75202

Re: Bi-Monthly Progress Report, R&H Oil/Tropicana Energy Site, San Antonio, Texas

Dear Mr. Villarreal:

Pursuant to Section IX, Paragraph 37 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

- 1. <u>Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period</u> The following actions were taken during the previous two-month period:
 - Laboratory analytical data were validated in accordance with the project Quality Assurance Project Plan (QAPP).
 - The Draft Screening Level Ecological Risk Assessment was prepared (submitted to EPA on August 1).
 - Preparation of the Remedial Investigation (RI) Report was initiated.
 - Site-wide groundwater gauging and light non-aqueous phase liquid (LNAPL) thickness measurement events were conducted on June 6 and July 7, 2012. The results of the gauging events are provided in Tables 1 and 2.
 - A LNAPL baildown test was conducted at well MW-13, initiated July 7 and measurements collected July 9, July 11, July 13, and July 16.
- Quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – The following qualityassured data were received during the preceding two month period:
 - Analytical data were received and data validation completed for the groundwater and soil samples collected in May following the site-wide groundwater sampling

event and installation of off-site monitoring wells. The laboratory analytical reports and the data validation reports are provided in digital format on the included CD.

- 3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion The following work is planned for the next two months:
 - Preparation of the RI Report will be continued.
 - Preparation of the Baseline Risk Human Health Assessment (BHHRA) will be initiated.
 - Preparation of the Feasibility Study (FS) will be intitiated.

The planned schedule for this work is generally consistent with the overall RI/FS schedule provided in the approved RI/FS Work Plan.

4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered or anticipated during the preceding two-month period.

Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

Eric F. Pastor P.E. Principal Engineer

Tim Nickels Project Scientist

Attachments:

Table 1 Monitoring Well Gauging Summary – June 6, 2012 Table 2 Monitoring Well Gauging Summary – July 7, 2012

Data CD:

Laboratory Data Package J54839 (Groundwater) Laboratory Data Package J54909 (Groundwater) Laboratory Data Package J54676 (Soil) Data Validation Report for Groundwater Data Validation Report for Soils Access/Scribe Database Mr. Chris Villarreal August 6, 2012 Page 3

cc: Marilyn Long – TCEQ

Leslie Alexander – de maximis, inc. Lee Bishop – Exxon Mobil Corporation Heather Corken – Fulbright & Jaworski, LLP Gary Elkin – BAE Systems Resolution, Inc.

Jack Healy - Perkin Elmer Automotive Research, Inc.

Heidi Hughes Bumpers – Jones Day Paul Kirkpatrick – Structural Metals, Inc. Larry King – Flint Group Incorporated Earl Moran – Exxon Mobil Corporation

James Morriss, III - Thompson & Knight, LLP

Duane Ness - Flint Group Incorporated

Mary Smith - Office of the Attorney General of Texas

Robert Sterrett – Itasca Denver, Inc. Rudy Valdes – National Radiator

Elizabeth Webb - Thompson & Knight, LLP

TABLE 1

Monitoring Well Gauging Summary - June 6, 2012

R&H Oil Company/Tropicana Energy Superfund Site, San Antonio, Texas

								Corrected
,,, ,, ,,,	D .		Measuring	D 1 . W	Depth to	NAPL	Water Level	Water Level
Well ID	Date			Depth to Water	NAPL	Thickness	Elevation	Elevation
		(ft, BGS)	(ft, MSL)	(ft, BMP)	(ft, BMP)	(ft)	(ft, MSL)	(ft, MSL)
MW-1	6/6/2012	10-40	657.29	18.49	ND		638.80	638.80
MW-2	6/6/2012	11-42	659.25	20.60	ND	. 	638.65	638.65
MW-3	6/6/2012	10-48	657.34	19.08	18.55	0.53	638.26	638.67
MW-4	6/6/2012	10-44	660.21	21.27	ND		638.94	638.94
MW-5	6/6/2012	10.5-43	656.93	18.23	18.18	0.05	638.70	638.74
MW-6	6/6/2012	10-54.5	656.95	18.55	18.27	0.28	638.40	638.62
MW-7	6/6/2012	30-45	655.13	16.60	ND		638.53	638.53
MW-8	6/6/2012	30-45	654.42	16.25	ND		638.17	638.17
MW-9	6/6/2012	25-40	654.17	15.73	ND		638.44	638.44
MW-10	6/6/2012	23-38	653.57	15.25	ND		638.32	638.32
MW-11	6/6/2012	25-40	654.55	15.99	ND		638.56	638.56
MW-12	6/6/2012	10-25	659.90	20.61	ND		639.29	639.29
MW-13	6/6/2012	10-25	662.65	24.82	23.41	1.41	637.83	638.93
MW-14	6/6/2012	10-25	660.17	21.52	21.17	0.35	638.65	638.92
MW-15	6/6/2012	10-25	659.94	21.14	21.04	0.1	638.80	638.88
MW-16	6/6/2012	10-25	659.20	20.59	ND		638.61	638.61
MW-17	6/6/2012	10-25	659.23	20.65	ND	-	638.58	638.58
MW-18	6/6/2012	10-25	660.60	21.57	ND		639.03	639.03
MW-19	6/6/2012	10-25	658.37	19.88	19.74	0.14	638.49	638.60
MW-20	6/6/2012	10-30	659.38	20.60	ND	-	638.78	638.78
MW-21	6/6/2012	8-23	654.19	15.77	ND	722	638.42	638.42
MW-22	6/6/2012	10-25	654.07	15.95	ND		638.12	638.12
NMW-1	6/6/2012	10-25	662.30	23.19	23.05	0.14	639.11	639.22
NMW-2	6/6/2012	10-25	660.61	21.88	ND		638.73	638.73
NMW-3	6/6/2012	10-25	660.63	23.75	21.36	2.39	636.88	638.74
NMW-4	6/6/2012	10-25	660.99	22.00	ND		638.99	638.99
NMW-5	6/6/2012	10-25	660.45	21.55	ND		638.90	638.90

Notes

- 1. Water levels in wells containing LNAPL were corrected using an LNAPL specific gravity of 0.78 as determined from analysis of LNAPL collected at well NMW-3.
- 2. ND Measurable LNAPL thickness not greater than 0.01 feet. MSL = Mean sea level.
- 3. BMP = Below measuring point. BGS = Below ground surface.

TABLE 2

Monitoring Well Gauging Summary - July 7, 2012

R&H Oil Company/Tropicana Energy Superfund Site, San Antonio, Texas

			Managina		Douth to	NAPL	Water Level	Corrected Water Level
Well ID	Date	Caraan Interreal	Measuring	Depth to Water	Depth to NAPL	Thickness	Elevation	Elevation
Well ID	Date			(ft, BMP)	52877D437.7 500			500000 NO. 1010 NO. 1000
2007.1	7/7/0010	(ft, BGS)	(ft, MSL)		(ft, BMP)	(ft)	(ft, MSL)	(ft, MSL)
MW-1	7/7/2012	10-40	657.29	19.91	ND		637.38	637.38
MW-2	7/7/2012	11-42	659.25	22.05	ND	2.00	637.20	637.20
MW-3	7/7/2012	10-48	657.34	23.25	19.27	3.98	634.09	637.19
MW-4	7/7/2012	10-44	660.21	22.72	ND	(57)	637.49	637.49
MW-5	7/7/2012	10.5-43	656.93	19.89	19.64	0.25	637.04	637.24
MW-6	7/7/2012	10-54.5	656.95	20.14	19.68	0.46	636.81	637.17
MW-7	7/7/2012	30-45	655.13	18.07	ND		637.06	637.06
MW-8	7/7/2012	30-45	654.42	17.50	ND	44	636.92	636.92
MW-9	7/7/2012	25-40	654.17	17.20	ND	24	636.97	636.97
MW-10	7/7/2012	23-38	653.57	16.74	ND		636.83	636.83
MW-11	7/7/2012	25-40	654.55	17.45	ND		637.10	637.10
MW-12	7/7/2012	10-25	659.90	22.55	22.54	0.01	637.35	637.36
MW-13	7/7/2012	10-25	662.65	26.12	24.59	1.53	636.53	637.72
MW-14	7/7/2012	10-25	660.17	23.03	22.6	0.43	637.14	637.48
MW-15	7/7/2012	10-25	659.94	22.67	22.37	0.3	637.27	637.50
MW-16	7/7/2012	10-25	659.20	22.05	ND		637.15	637.15
MW-17	7/7/2012	10-25	659.23	22.13	22.11	0.02	637.10	637.12
MW-18	7/7/2012	10-25	660.60	22.95	ND	-	637.65	637.65
MW-19	7/7/2012	10-25	658.37	21.60	21.06	0.54	636.77	637.19
MW-20	7/7/2012	10-30	659.38	22.02	ND	200	637.36	637.36
MW-21	7/7/2012	8-23	654.19	17.24	ND	22	636.95	636.95
MW-22	7/7/2012	10-25	654.07	17.43	ND		636.64	636.64
NMW-1	7/7/2012	10-25	662.30	24.07	23.89	0.18	638.23	638.37
NMW-2	7/7/2012	10-25	660.61	23.34	ND		637.27	637.27
NMW-3	7/7/2012	10-25	660.63	25.77	22.35	3.42	634.86	637.53
NMW-4	7/7/2012	10-25	660.99	23.31	ND		637.68	637.68
NMW-5	7/7/2012	10-25	660.45	22.99	ND		637.46	637.46

Notes

- 1. Water levels in wells containing LNAPL were corrected using an LNAPL specific gravity of 0.78 as determined from analysis of LNAPL collected at well NMW-3.
- 2. ND Measurable LNAPL thickness not greater than 0.01 feet. MSL = Mean sea level.
- 3. BMP = Below measuring point. BGS = Below ground surface.